

**To:** Keith Howard[KHoward@cwclaw.com]  
**Cc:** Gary Levin (garyl@levinterminal.com)[garyl@levinterminal.com]  
**From:** Jolish, Taly  
**Sent:** Wed 6/11/2014 3:58:59 PM  
**Subject:** RE: Question re United Heckathorn documents

Hello, Keith – with apologies for the delay, I am forwarding a link to the United Heckathorn presentation given by EPA’s project manager, Rachelle Thompson, at the Richmond City Council on May 27, 2014:

<http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/b499438e172cf10388257>

If that link does not work, you can find the same document available at the EPA web page for the site – [www.epa.gov/region09/UnitedHeckathorn](http://www.epa.gov/region09/UnitedHeckathorn) – or I can send it as a pdf.

With respect to the deposition transcripts, I am waiting for a determination from DOJ and, if we decide to release them, I will let you know if advance. Thanks. Taly

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**From:** Keith Howard [mailto:KHoward@cwclaw.com]  
**Sent:** Thursday, May 29, 2014 9:38 AM  
**To:** Jolish, Taly  
**Cc:** Gary Levin (garyl@levinterminal.com)  
**Subject:** RE: Question re United Heckathorn documents

Thanks. Given that Montrose has objected to the production of the requested documents and cited a “confidentiality Order,” for the present Levin’s position is the same. Clearly, the Roger Pool letter was submitted as a part of a settlement negotiation and is privileged. If Montrose’s position changes or if EPA determines that the depositions are not protected by a confidentiality

order please let me know and Levin may revisit its current position with respect to the depositions. On another topic, Levin understands that EPA made a presentation this week to the City of Richmond on the status of the United Heckathorn Site. Levin's understanding is that EPA informed the City that "clean up" would begin next year. I am not aware of any recent EPA updates on the status of the Focused Feasibility Study, but assume there will be one before any clean up begins. Any information you could give me regarding EPA's schedule of anticipated activities related to the site will be appreciated.

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